

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

ROBERT GASPER PERI

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CRIMINAL NO. 4:20-CR-00116

DEFENDANT’S UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE
TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant, through Counsel, and requests permission that the Defendant be allowed expand the area in which he may travel, while maintaining GPS monitoring.

Currently, Defendant must remain within the walls of his house, but needs to be outside his residence and to be able to travel about his 42-acre farm to maintain the property, and to travel to the greater Toledo, Ohio and Fort Wayne, Indiana area to seek employment.

Defendant would like to be allowed to expand the area of his restriction to include the farm land, and the route to Toledo, Ohio and Fort Wayne, Indiana, where he hopes to find a job.

Defense Counsel has discussed this motion with Assistant U.S. Attorney Zahra Fenelon and Defendant’s U.S. Pretrial Services Officer in Ohio, both of whom are unopposed to our request.

WHEREFORE, premises considered, the Defendant very respectfully requests that This Honorable Court grant this unopposed motion modify conditions of release.

Very respectfully,

/S/ Guy L. Womack

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CERTIFICATE OF SERVICE

A copy of the foregoing was delivered via email to Government Counsel on this 26th day of August, 2020.

/S/ Guy L. Womack
Guy L. Womack